

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
SEP 08 2021
U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHARLES HUNTER,

Defendant.

CAUSE NO.

1 : 21-cr-0261 SEB-TAB

INDICTMENT

The Grand Jury charges that:

COUNT 1

18 U.S.C. § 922(a)(6)

Making a False Statement during the Purchase of a Firearm

On or about March 31, 2021, in Marion County, Indiana, within the Southern District of Indiana, CHARLES HUNTER, the defendant herein, in connection with the acquisition of a firearm(s), to wit: a Glock model 19x bearing serial number BTDX767; and/or a Glock model 19x bearing serial number BTDX768 from Indy Arms Company a licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to Indy Arms Company, which statement was intended and likely to deceive Indy Arms Company, as to a material fact to the lawfulness of such acquisition of the said firearm(s) to the defendant under chapter 44 of Title 18, in that the defendant did falsely declare on an ATF Form 4473, Firearms Transaction Record, that his residence and address was 7310 Nantucket, Indianapolis, Indiana 46226 Ct. Apt. 2. All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 2

18 U.S.C. § 924(a)(1)(A)

Making a False Statement with Respect to Information
Required to Be Kept by Licensed Firearms Dealers

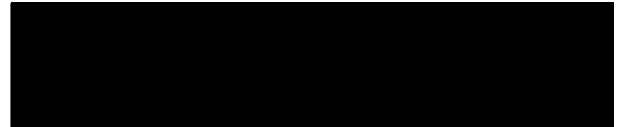
On or about March 31, 2021, in Marion County, Indiana, within the Southern District of Indiana, the defendant, CHARLES HUNTER, the defendant herein, did knowingly make a false statement and representation to Indy Arms Company, a licensed firearms dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Indy Arms Company, in that the defendant did falsely declare on an ATF Form 4473, Firearms Transaction Record, that his residence and address was 7310 Nantucket, Indianapolis, Indiana 46226 Ct. Apt. 2.. All in violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATION

1. The allegations contained in this indictment are realleged as if fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461(c).

2. If convicted of an offense set forth in this Indictment, Defendant herein shall forfeit to the United States any firearm or ammunition involved in or used in such offense.

A TRUE BILL:



(FOREPERSON)

JOHN E. CHILDRESS
Acting United States Attorney

By:

A handwritten signature in black ink, appearing to be "Lawrence D. Hilton", written over a horizontal line.

Lawrence D. Hilton
Assistant United States Attorney